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March 26, 2007

Thomasenia P. Duncan, Esq.  
Acting General Counsel  
Federal Election Commission  
999 E Street NW  
Washington, DC 20463

Re: MUR 5895

Dear Ms. Duncan:

We are counsel to Meeks for Congress, Patsy A. Simmons in her official capacity as treasurer, ("the Committee"), and Congressman Gregory W. Meeks, Respondents in the above-referenced matter.<sup>1</sup> We write in response to the Commission's letter of January 16, 2007, notifying Respondents of its finding of reason to believe.

This matter shows how the audit of an unrepresented committee can result in flawed findings, which in turn can provide an unsound basis for enforcement. The whole basis for this enforcement action is the Final Audit Report that the Commission adopted on August 17, 2006. Yet, as this response will show, there are several instances in which the audit findings contained mistakes of law and fact – mistakes which the Commission seems to have uncritically adopted in its finding of reason to believe.

There is no doubt that, during 2003 and 2004, Meeks for Congress suffered from poor recordkeeping, reporting errors, and inadequate financial controls. It has taken major steps to correct these problems. Yet, relying entirely on audit findings that were not effectively challenged at the time, the Commission seeks not simply to punish the Committee for these mistakes but to single out the candidate personally as well. Such an outcome is not supportable given the flawed nature of the audit findings. This matter ought to be resolved – but not on these terms.

<sup>1</sup> Patsy A. Simmons replaced Joan E. Flowers as treasurer of Meeks for Congress through an amended Statement of Organization that was filed with the Commission on January 20, 2007, shortly after the Commission sent its notification in this matter.

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
OFFICE OF GENERAL  
COUNSEL

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#### **A. Introduction**

Meeks for Congress is the principal campaign committee for Gregory W. Meeks, Member of the United States House of Representatives from the 6th District of New York. As the Audit Report noted, the accounting, recordkeeping and other day-to-day operations of the Committee were handled by a volunteer. See Audit Report at 2.

The Commission selected the Committee for audit for its 2004 election cycle activity. The fieldwork was conducted in Springfield Gardens, NY. The Committee was represented solely by the treasurer. While there were gaps in the Committee's receipt and disbursement records, no subpoenas were issued; the Audit Report contained nothing to suggest that the Committee withheld any available, responsive records.

The audit process prompted the Committee and Congressman Meeks to take corrective action in reliance on the findings. Upon learning of the audit's finding that the Committee had made \$7,146 in payments to a personal trainer and for other miscellaneous expenses, Congressman Meeks reimbursed the Committee in this amount. After publication of the audit report, the Committee hired Evans & Katz, a political accounting firm in Washington, DC with extensive FEC experience, to amend its reports and professionalize its compliance operations. Amendments to the Committee's 2004 cycle reports were filed in February 2007. The Committee has also refunded contributions identified by the auditors as excessive or prohibited.

However, Respondents and Congressman Meeks made many of these refunds and reimbursements while erring on the side of caution. A close review of the audit findings shows that they were frequently grounded in mistakes of law and fact – mistakes that now provide the basis for much of the present enforcement action.

#### **B. Personal Use of Campaign Funds**

The auditors identified three categories of expenses that they contended to be personal use of campaign funds: (1) the campaign's payment for a vehicle used by Congressman Meeks in his district for political travel, (2) miscellaneous expenses incurred on a campaign credit card, and (3) payments to a personal trainer who worked with the Congressman in the district. A close look at these expenses shows that the auditors' findings were deeply flawed, and often plainly erroneous. They ignored basic Commission precedents, and drew hostile conclusions unsupported by the facts.

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## 1. District Automobile

Throughout the 2004 election cycle, the Committee maintained two vehicles for the Congressman's political use – one in the Washington, DC area, and one in his New York district.<sup>2</sup> The first vehicle was the subject of an advisory opinion that the Congressman sought six years ago. *See* Advisory Opinion 2001-3. Located in his district, the second vehicle involved different facts, and thus was not covered by the earlier opinion. *See* 2 U.S.C. § 437f(c)(1)(B) (allowing reliance only when the conduct "is indistinguishable in all its material aspects" from that approved). For this second vehicle, the Committee and the Congressman allocated the costs on a 50/50 basis, with the Committee paying for the portion of the expenses that were associated with political travel, and with the Congressman paying for the portion associated with his personal activities. *See* 11 C.F.R. § 113.1(g)(1)(ii)(D).

The auditors made several errors when they found the expenses associated with the New York car to be personal use:

*First*, they used the 2001 advisory opinion as a sword – not as a shield. "The Commission may not use advisory opinions as a substitute for rulemaking ... Where the law is of uncertain application, advisory opinions cannot be used as a sword of enforcement." Statement of Reasons, Audits of Dole for President *et al.* (June 24, 1999). The auditors ignored this basic rule. "In following the advisory opinion (AO 2001-3) requested by MFC and pursuant to 11 CFR § 113.1(g)(ii)(D) (*sic*), the Audit staff maintains MFC was required to keep a mileage log or some other record to document the use of vehicles for campaign and non-campaign activities." Audit Report at 17.

*Second*, they ignored the plain text of 11 C.F.R. § 113.1(g)(1)(ii)(D). That rule does not treat vehicle expenses as *per se* personal use. Instead, it requires them to be considered "on a case-by-case basis." 11 C.F.R. § 113.1(g)(1)(ii)(D). It imposes no recordkeeping requirement as a necessary precondition to avoid a personal use finding. *Id.* It simply requires that, if a vehicle "is used for both personal activities beyond a *de minimis* amount and campaign or officeholder-related activities," the candidate must reimburse the campaign within thirty days for the expenses associated with the personal activities. *Id.* By paying concurrently with the campaign for his share of the vehicle expenses, Congressman Meeks surpassed the rule's thirty-day reimbursement requirement.

*Third*, the auditors illogically assumed that, because the Committee lacked records to show how often the car had been used for political travel, *all* of its costs must have been personal use. *See* Audit Report at 17. They even reached this conclusion without any evidence that the Congressman had used the automobile for personal purposes at all, other than the fact that he

<sup>2</sup> Two vehicles were leased for use in the district at different times during the audit period. *See* Audit Report at 18.

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chose to pay personally for some of its costs. In fact, circumstantial evidence tends to support the allocation used by the Committee and the candidate – specifically, the frequency of his political activities in the district. The auditors found no facts to contradict the allocation assumptions, nor did they even attempt to determine the amount of personal use.

## **2. Credit Card Disbursements**

The Audit Report identified \$916 in expenses on a Committee credit card as personal use. Yet again, the auditors simply assumed that these expenses were personal use, while ignoring the law and the specific facts involved.

Of these expenses, \$265.08 were for cell phone hardware – one of the most common types of expenses for any campaign. There were no facts to suggest that these expenses were personal use. Again, circumstantial evidence and common sense would suggest the opposite. Like nearly every other campaign, Meeks for Congress paid to maintain cell phone service, in transactions that were undisturbed by the auditors. Like nearly every other candidate, Congressman Meeks was required to use a cell phone for fundraising and political phone calls as part of his day-to-day work.

Similarly, \$382.10 of these expenses involved expenses relating to Mr. Meeks' young daughter, as he and his wife attended political and official events. babysitting expenses to care for her while they attended a Congressional Black Caucus event in Puerto Rico, and travel expenses for his mother-in-law to come care for her at a campaign event in the district. Here again, however, the auditors ignored clear Commission guidance. In Advisory Opinion 2005-9, for example, the Commission allowed a Senator's principal campaign committee to pay for his wife and minor children to accompany him on campaign and officially connected travel. In Advisory Opinion 1995-42, the Commission allowed a House Member's campaign to use campaign funds to pay for babysitting expenses, so that he and his wife could attend campaign-related events. The Commission even went out of its way to indicate that the campaign could pay his family members to provide these services, so long they were treated no differently than other campaign staff. See Advisory Opinion 1995-42 n.2. In light of these opinions, there is no basis for classifying these expenses as personal use.

Finally, as to a \$119 purchase of tickets and a \$3.50 hotel expense that was incurred while the Congressman attended a Congressional Black Caucus event in Nassau, the auditors simply assumed that the expenses were personal use, while presenting no facts regarding the purpose of these expenditures, even though both types of expenses are commonly found on FEC reports. For example, the Commission has made clear that the purchase of tickets by a campaign is perfectly permissible so long as it is "part of a particular campaign event or officeholder activity." Expenditures; Reports by Political Committees, Personal Use of Campaign Funds, 60 Fed. Reg. 7862, 7866 (Feb. 9, 1995)

### 3. Personal Trainer

The Audit Report identified \$6,230 in payments to a personal trainer who provided services to the Congressman. Yet the Report made no effort to examine or evaluate the circumstances of these payments, or indeed, to what degree the Congressman was involved in them.

The Congressman owns a lifetime membership in Cross Island Sports & Fitness Centre, Inc., for which he paid personally. From time to time, while at the gym, he was assisted by individuals who worked there, under circumstances which he believed to have been covered by his paid membership. At issue in the audit were additional payments authorized by the Committee's then-treasurer, who was also the CEO of the gym,<sup>3</sup> under circumstances which she thought to be permitted under Commission rules. When the auditors identified the payments, the Congressman made complete reimbursement.

In any event, it is not certain from the text of the rules and Commission precedent that the identified payments would have been personal use. The rule lists health club dues among the list of *per se* personal use. See 11 C.F.R. § 113.1(g)(1)(i)(G). Here, however, the Congressman had already paid personally for his lifetime membership in the gym. The regulations do not list physical therapy or other services; therefore, it is not clear whether or not these payments constitute personal use, or how they would fare under the "irrespective" test. The FEC has permitted campaigns to pay for analogous personal services before. For example, in Advisory Opinion 1997-11, the Commission allowed a Member of Congress to take Spanish-language immersion classes in Mexico, so that she could communicate better with her Spanish-speaking constituents. Lacking any legal analysis on the subject, the Audit Report does not clearly state the theory on which these particular expenses were deemed prohibited.

The Audit Report shows one instance where the Committee would have benefited from more rigid financial controls: when a campaign credit card was used to buy a \$146.48 formal dress shirt for the Congressman to wear as he spoke at a political event. This instance, however, which had some nexus to some officeholder and candidate status, does not rise to the level where it becomes appropriate to fine a Member of Congress personally and subject him to the indignity of a charged legal finding rarely made by the Commission. The auditors' zeal to presume personal use in other instances where none plainly existed should cause the Commission to reconsider this radical course of action.

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<sup>3</sup> See Exhibit A.

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### **C. Apparent Prohibited Contributions**

The Audit Report noted the receipt of \$7,070 from corporations and limited liability companies (LLCs). The Audit Report concluded that all of these contributions were prohibited.<sup>4</sup>

There are thirteen contributions in question. Of those, eight are from LLCs. The Committee could not produce confirmations that these donors were taxed as partnerships under IRS rules. The Audit Report concluded that these contributions were therefore prohibited. Yet it is not clear that these were corporate contributions, as the auditors seemed to presume. Indeed, as the Commission noted when it revised the LLC rules, "most LLCs choose [partnership] tax classification, or acquire it through default." Treatment of Limited Liability Companies Under the Federal Election Campaign Act, 64 Fed. Reg. 37,397, 37,398 (July 12, 1999). Once again, this is a recordkeeping problem which the auditors framed as illegal conduct.

Of the five identified corporate contributions, the Audit Report said: "The corporate status of the entities at the time the contribution was made was verified with the Secretary of State." Audit Report at 10. Yet documentation on file with New York Department of State suggests that two of these five contributors – Advance Group, Inc. and Home Link Realty, Inc. – had been dissolved for years at the time of the contribution. Thus, for legal purposes, these donors do not seem to have been corporations at all

Thus, from the known facts, only three of the thirteen contributions in question, totaling only \$755 00, seem to be from prohibited sources. This again demonstrates the Audit Report's conclusory approach, which the Commission's reason-to-believe finding uncritically adopted.

### **D. Excessive Contributions**

The Audit Report noted the receipt of \$22,990 in funds from 16 individuals, before the primary election, that were in excess of their primary election limit. These contributions were all disclosed as general election contributions, and there is no allegation that any contribution exceeded an individual's election cycle limit to the Committee. The Committee's treasurer provided an affidavit stating that contributors were informed verbally of the redesignation. Thus, the only allegation in the Audit Report is that the Committee could not demonstrate that contributors were informed in writing that their contributions were redesignated.

This finding demonstrates the Audit Report's attempt to cast facts in the worst possible light. The contributions were not identified as "excessive", they were within the primary and general election limits. The contributors were, in fact, notified of the presumptive redesignation of their funds. The Committee's only mistake was in not sending the written notifications required by 11

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<sup>4</sup> A schedule of these contributions is attached as Exhibit B.

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C.F.R. § 110.1(b)(5)(ii)(B). Moreover, upon receipt of the Audit Report, the Committee refunded the contributions in question, with the sole exception of one \$70 contribution that was not made until after the primary election and was included in error on the Audit Report.<sup>5</sup>

**E. Misstatement of Financial Activity**

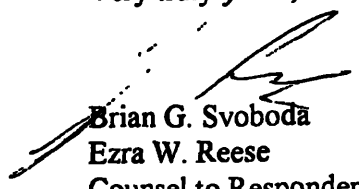
The Commission's [REDACTED] states that the Committee "misstated the Committee's cash on hand, receipts and disbursements in the aggregate amount of \$278,636 in the years 2003 and 2004." That statement is highly misleading. The aggregate total is the result of smaller errors, both overstating and understating activity. Moreover, upon receipt of the Audit Report, the Committee filed numerous amendments to its reports to correct the errors.

**F. Conclusion**

[REDACTED]

We look forward to discussing these matters further at your convenience.

Very truly yours,

  
Brian G. Svoboda  
Ezra W. Reese  
Counsel to Respondents

cc: Christine C. Gallagher, Esq

<sup>5</sup> A schedule of these contributions is attached as Exhibit C. The contribution from Mohammad Aminullah, dated October 15, 2004 and received on October 18, 2004 in the amount of \$70, was mistakenly included on the list of excessive primary contributions

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# Attachment A

27044182194



# NYS Department of State

## Division of Corporations

### Entity Information

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**Selected Entity Name:** CROSS ISLAND SPORTS & FITNESS CENTRE, INC.

**Selected Entity Status Information**

**Current Entity Name:** CROSS ISLAND SPORTS & FITNESS CENTRE, INC.

**Initial DOS Filing Date:** SEPTEMBER 11, 1991

**County:** QUEENS

**Jurisdiction:** NEW YORK

**Entity Type:** DOMESTIC BUSINESS CORPORATION

**Current Entity Status:** ACTIVE

**Selected Entity Address Information**

**DOS Process (Address to which DOS will mail process if accepted on behalf of the entity)**

CROSS ISLAND SPORTS & FITNESS CENTRE, INC.

219-10 S. CONDUIT AVE

SPRINGFIELD GARDENS, NEW YORK, 11413

**Chairman or Chief Executive Officer**

JOAN FLOWERS

219-10 S. CONDUIT AVE

SPRINGFIELD GARDENS, NEW YORK, 11413

**Principal Executive Office**

JOAN E FLOWERS

219-10 S. CONDUIT AVE

SPRINGFIELD GARDENS, NEW YORK, 11413

**Registered Agent**

NONE

NOTE: New York State does not issue organizational identification numbers.

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1574497

## CORPORATE RECORDS &amp; BUSINESS REGISTRATIONS

This Record Last Updated: 09/01/1997  
Database Last Updated: 03-09-2007  
Update Frequency: WEEKLY  
Current Date: 03/09/2007  
Source: AS REPORTED BY THE SECRETARY OF STATE OR OTHER  
OFFICIAL SOURCE

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## COMPANY INFORMATION

Company Name: CROSS ISLAND SPORTS & FITNESS CENTRE, INC.  
Process Name: THE CORPORATION  
Process Address: 219-10 S. CONDUIT AVE  
SPRINGFIELD GARDENS, NY 11413  
County: QUEENS

## FILING INFORMATION

Identification Number: 1574497  
Filing Date: 09/11/1991  
State of Incorporation: NEW YORK  
Duration: PERPETUAL  
Status: ACTIVE  
Status Attained Date: 09/01/1997  
Corporation Type: PROFIT  
Business Type: DOMESTIC BUSINESS CORPORATION  
Where Filed: DEPARTMENT OF STATE/DIVISION OF CORPORATIONS  
41 STATE STREET  
ALBANY, NY 12231

## PRINCIPAL INFORMATION

Name: JOAN FLOWERS

Address: 219-10 S. CONDUIT AVE  
SPRINGFIELD GARDENS, NY 11413

## EXECUTIVE OFFICE INFORMATION

Name: JOAN E FLOWERS  
Address: 219-10 S. CONDUIT AVE  
SPRINGFIELD GARDENS, NY 11413

## AMENDMENT INFORMATION

Amendments: 12/01/1998 ADDRESS CHANGE AMENDED PROCESS  
INFORMATION REFER TO MICROFILM NUMBER 981201002504  
12/01/1998 ADDRESS CHANGE AMENDED ADDRESS OF  
CHAIRMAN OF THE BOARD REFER TO MICROFILM NUMBER  
981201002504  
12/01/1998 ADDRESS CHANGE AMENDED EXECUTIVE OFFICE  
LOCATION REFER TO MICROFILM NUMBER 981201002504  
05/14/1993 ADDRESS CHANGE AMENDED ADDRESS OF  
CHAIRMAN OF THE BOARD REFER TO MICROFILM NUMBER  
930514002778  
05/14/1993 ADDRESS CHANGE AMENDED EXECUTIVE OFFICE  
LOCATION REFER TO MICROFILM NUMBER 930514002778

## STOCK INFORMATION

Stock: Authorized 100  
Shares:

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# Attachment B

Federal Election Commission

**Meeks for Congress**

Testing of Contributions from Individuals

Possible Prohibited Contributions

Prepared by Chris Carrell

W/P C.3.3

Name	Amount	Date	Prohibited	Error Amount
J. Adams Consulting, LLC	250.00	8/20/2004	8/30/2004 Yes	\$250.00
Triangle Equities Mgmt Co. LLC	250.00	8/20/2003	8/30/2004 Yes	\$250.00
Law of Offices of Daniel W. Isaacs, PLLC	500.00	5/12/2003	5/20/2003 Yes	\$500.00
Urban Strategies, LLC	750.00	5/12/2003	5/20/2003 Yes	\$750.00
Triangle Equities Mgmt Co. LLC	500.00	10/8/2003	10/16/2003 Yes	\$500.00
Monroe Funding LLC	500.00	11/10/2003	11/20/2003 Yes	\$500.00
Advent Capital Management, LLC	500.00	1/13/2004	11/25/2003 Yes	\$500.00
Advent Capital Mgmt, LLC	2,000.00	5/12/2003	5/20/2003 Yes	\$2,000.00
Home Link Realty, Inc.	1,000.00	10/22/2003	10/24/2003 Yes	\$1,000.00
Advance Group, Inc.	65.00	10/22/2003	10/24/2003 Yes	\$65.00
Kawal P. Totaram, PC	500.00	10/17/2003	10/22/2003 Yes	\$500.00
Kenneth Leacock, PT, PC	65.00	10/17/2003	10/22/2003 Yes	\$65.00
Daniel W. Bythewood, PC	190.00	10/17/2003	10/22/2003 Yes	\$190.00
			7,070.00	

Federal Election Commission

**Meeks for Congress**

Testing of Contributions from Individuals  
Possible Prohibited Contributions  
Prepared by Chris Carrell  
W/P C.3.3

Name	Comments
J. Adams Consulting, LLC	Active Corporation, Initial Filing Date was 12/2/02
Triangle Equities Mgmt Co. LLC	Active Corporation, Initial Filing Date was 10/2/97
Law of Offices of Daniel W. Isaacs, PLLC	Active Corporation, Initial Filing Date was 10/19/01
Urban Strategies, LLC	Active Corporation, Initial Filing Date was 3/26/99
Triangle Equities Mgmt Co. LLC	See N3
Monroe Funding LLC	Active Corporation, Initial Filing Date was 7/11/01
Advent Capital Mangement, LLC	Active Corporation, Initial Filing Date was 4/19/01
Advent Capital Mgmt, LLC	See N8
Home Link Realty, Inc.	Inactive Corporation, no date for when it went inactive, Initial Filing Date was 3/9/94
Advance Group, Inc.	Inactive Corporation, no date for when it went inactive, Initial Filing Date was 10/16/72
Kawal P. Totaram, PC	Active Corporation, Initial Filing Date was 3/2/05
Kenneth Leacock, PT, PC	Active Corporation, Initial Filing Date was 10/16/89
Daniel W. Bythewood, PC	Active Corporation, Initial Filing Date was 9/14/82

# Attachment C

27044182201

Federal Election Commission

## Meeks for Congress

Testing of Contributions from Individuals

Possible Excessive Contributions

Prepared by Bill Antosz

W/P C.3.2

Item	MAIL NAME	DATE	DEPOSITED AMOUNT	Excessive	Sum of AMOUNT
1	Yitzchok Schwartz	7/31/2003	2,000.00		4,000.00
	Yitzchok Schwartz	7/31/2003	2,000.00	2,000.00	4,000.00
2	William Nussen	8/20/2004	2,000.00		4,000.00
	William Nussen	8/20/2004	2,000.00	2,000.00	4,000.00
3	Tonio Burgos	5/15/2003	2,000.00		4,000.00
	Tonio Burgos	5/15/2003	2,000.00	2,000.00	4,000.00
4	Stewart, Greenblatt, Manning & Baez	7/31/2003	1,000.00		4,000.00
	Stewart, Greenblatt, Manning & Baez	7/31/2003	2,000.00	1,000.00	4,000.00
	Stewart, Greenblatt, Manning & Baez	12/3/2003	1,000.00	1,000.00	4,000.00
5	Steven G Rubenstein	7/31/2003	500.00		2,500.00
	Steven G Rubenstein	12/3/2003	500.00		2,500.00
	Steven G Rubenstein	12/3/2003	1,500.00	500.00	2,500.00
	Stephen C. Rush, MD	12/6/2003	2,000.00		2,140.00
	Stephen C. Rush, MD	10/15/2004	140.00		2,140.00
6	Richard Rawle	7/20/2003	500.00		2,500.00
	Richard Rawle	7/20/2003	2,000.00	500.00	2,500.00
7	Neil Abramson	4/16/2003	500.00		3,000.00
	Neil Abramson	7/26/2003	500.00		3,000.00
	Neil Abramson	7/6/2004	1,500.00	500.00	3,000.00
	Neil Abramson	7/6/2004	500.00	500.00	3,000.00
8	Mohammad Aminullah	10/17/2003	500.00		3,840.00
	Mohammad Aminullah	10/17/2003	195.00		3,840.00
	Mohammad Aminullah	11/10/2003	75.00		3,840.00
	Mohammad Aminullah	4/3/2004	1,230.00		3,840.00
	Mohammad Aminullah	4/3/2004	1,770.00	1,770.00	3,840.00
	Mohammad Aminullah	10/15/2004	70.00	70.00	3,840.00
9	Martin J. McLaughlin	4/1/2003	1,000.00		3,000.00
	Martin J. McLaughlin	5/15/2003	1,000.00		3,000.00

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	Martin J. McLaughlin	1/22/2003	11/25/2003	1,000.00	1,000.00	3,000.00
10	Maria B. Sheard	7/31/2003	8/6/2003	2,000.00		4,000.00
	Mana B. Sheard	7/31/2003	8/6/2003	2,000.00	2,000.00	4,000.00
11	Joseph M. Mattone, Sr	5/15/2003	5/20/2003	2,000.00		5,000.00
	Joseph M. Mattone, Sr	5/15/2003	5/20/2003	2,000.00	2,000.00	5,000.00
	Joseph M. Mattone, Sr	9/15/2004	9/21/2004	1,000.00	1,000.00	5,000.00
12	Gertrude J. Prior	6/30/2004	7/2/2004	500.00		2,500.00
	Gertrude J. Prior	6/30/2004	7/2/2004	2,000.00	500.00	2,500.00
13	F. Carlisle Towery	12/22/2002	12/24/2002	500.00		3,650.00
	F. Carlisle Towery	5/17/2003	5/20/2003	1,000.00		3,650.00
	F. Carlisle Towery	7/26/2003	7/28/2003	500.00		3,650.00
	F. Carlisle Towery	10/2/2003	10/6/2003	150.00	150.00	3,650.00
	F. Carlisle Towery	10/2/2003	10/6/2003	500.00	500.00	3,650.00
	F. Carlisle Towery	12/3/2003	12/8/2003	500.00	500.00	3,650.00
	F. Carlisle Towery	9/20/2004	9/27/2004	500.00		3,650.00
14	Desmond Emanuel	5/30/2003	8/12/2003	4,000.00	2,000.00	4,000.00
15	Cornelius B. Prior, Jr.		4/23/2004	2,000.00		2,000.00
	Cornelius B. Prior, Jr.	9/27/2004	9/27/2004	1,000.00	1,000.00	1,000.00
16	Alvin Benjamin	5/15/2003	5/20/2003	1,000.00		3,500.00
	Alvin Benjamin	7/31/2003	8/6/2003	1,000.00		3,500.00
	Alvin Benjamin	7/31/2003	8/6/2003	500.00	500.00	3,500.00
	Alvin Benjamin	10/18/2004	10/18/2004	1,000.00		3,500.00
					22,990.00	

Federal Election Commission

**Meeks for Congress**

Testing of Contributions from Individuals

Possible Excessive Contributions

Prepared by Bill Antosz

W/P C.3.2

Item	MAIL NAME
1	Yitzchok Schwartz
	Yitzchok Schwartz
2	William Nussen
	William Nussen
3	Tonio Burgos
	Tonio Burgos
4	Stewart, Greenblatt, Manning & Baez
	Stewart, Greenblatt, Manning & Baez
	Stewart, Greenblatt, Manning & Baez
5	Steven G. Rubenstein
	Steven G. Rubenstein
	Steven G. Rubenstein
	Stephen C. Rush, MD
	Stephen C. Rush, MD
6	Richard Rawle
	Richard Rawle
7	Neil Abramson
	Neil Abramson
	Neil Abramson
	Neil Abramson
8	Mohammad Aminullah
	Mohammad Aminullah
	Mohammad Aminullah
	Mohammad Aminullah
	Mohammad Aminullah
	Mohammad Aminullah
9	Martin J. McLaughlin
	Martin J. McLaughlin

check copy not available  
check copy not available

General contribution, check is dated 10/15/04

General contribution, check is dated 10/14/04

	Martin J. McLaughlin
10	Maria B. Sheard
	Maria B. Sheard
11	Joseph M. Mattone, Sr
	Joseph M. Mattone, Sr
	Joseph M. Mattone, Sr
12	Gertrude J. Prior
	Gertrude J. Prior
13	F. Carlisle Towery
	F. Carlisle Towery
	F. Carlisle Towery
	F. Carlisle Towery
	F. Carlisle Towery
	F. Carlisle Towery
	F. Carlisle Towery
	F. Carlisle Towery
14	Desmond Emanuel
15	Cornelius B. Prior, Jr.
	Cornelius B. Prior, Jr.
16	Alvin Benjamin
	Alvin Benjamin
	Alvin Benjamin
	Alvin Benjamin

check is dated 9/13/04, one day before primary election

2002 contribution, used for aggregation only

General contribution, check is dated 9/20/04

check is dated 4/26/04, nearly 5 months before primary election  
check copy not available

General contribution, check is dated 10/15/04